

**Federal Defenders  
OF NEW YORK, INC.**

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January 20, 2022

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Willie Dennis  
20 Cr. 623 (LGS)**

Dear Judge Schofield,

We write on behalf of Mr. Dennis in response to the Court's January 13, 2022 order and in furtherance of Mr. Dennis's request for bail modification in the above-captioned matter.

Pursuant to the Court's January 13 order, counsel for the defense and the Government have conferred regarding the appropriate doctor(s) to provide an opinion for the Court regarding Mr. Dennis's medical issues and the impact of the location monitoring equipment. This ongoing process has required finding a medical professional who is near Mr. Dennis's current location, available to examine Mr. Dennis in the near term, willing to provide a medical opinion to the Court on a short time frame, and willing to examine Mr. Dennis in the absence of medical insurance. Given these logistical issues and the delay in finding medical professionals during the current COVID outbreak, an agreed upon medical provider has not yet been identified, but the parties are continuing these efforts at this time. Based on information available to the undersigned, this process may take several more weeks to complete.

Since the Court's January 13, 2022 order, however, Mr. Dennis has continued to receive emergency medical treatment for his hernias. Mr. Dennis has also been seen by another surgeon who confirmed that Mr. Dennis is suffering from multiple hernias, which will require surgery. (The short-form medical records presently available are attached hereto as Exhibit J; the defense will supplement this record once more detailed medical records are made available.) This surgery has been scheduled for March 2022, the earliest such a procedure could be scheduled given overwhelmed medical facilities in Florida.

In addition, since the Court's January 13, 2022 order, Mr. Dennis's mother has needed to be hospitalized and his elderly father (who suffers from [REDACTED]) has required additional caregiving from Mr. Dennis while his mother is in the hospital. This has further increased the

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demands on Mr. Dennis at his parents' home to include, e.g., transporting his father to the hospital to visit his mother and picking up prescriptions and medical equipment for his mother. This increased caregiving responsibility for Mr. Dennis (in addition to all the other reasons stated in his original bail modification application) weighs further against any finding that Mr. Dennis is a risk of flight because he would certainly not abandon his parents at this time of their acute need for his support.

Accordingly, given the length of time it will likely take for Mr. Dennis to be seen by yet another medical professional, the cost of these visits for Mr. Dennis, the confirmed hernia diagnoses that Mr. Dennis has received from multiple independent medical professionals at this point, and the increased need for Mr. Dennis to be able to support and assist his elderly parents at this time without the strictures of home detention and location monitoring, the defense respectfully requests that the Court not wait for another medical opinion, but rather that the Court convene a remote conference at its earliest convenience to consider the pending bail modification request based on the present record. The defense has conferred with the Government, which stands by its previous objections to the pending request.

We thank the Court again for its consideration.

Respectfully submitted,

/s/ Neil Kelly

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cc: AUSA Sarah Kushner  
Pretrial Services Officer Joshua Rothman

## **EXHIBIT J – FILED UNER SEAL**